

REMARKS

Claims 1-3, 5-6, 10-12, 14-15, 31-32, and 36-40 are pending in the application. Claims 1, 6, 31, 36, and are independent. By the foregoing Amendment, Applicants have amended claims 1-3, 5-6, 10-12, 14-15, 31, 36, and 38 and have canceled claims 4, 7-9, 13, 16-30, 33-35, and 41-44. These changes are believed to introduce no new matter and their entry is respectfully requested.

Rejection of Claims 1-15 and 31-40 Under 35 U.S.C. §103(a)

In the Office Action, the Examiner rejected claims 1-15 and 31-40 under 35 U.S.C. 103(a) as being obvious over Service Advertisement and Discovery: Enabling Universal Device Cooperation, by Golden G. Richard III. (hereinafter "*Richard III*"). Applicants respectfully traverse the rejection.

To establish a *prima facie* case of obviousness, an Examiner must show that there is some expectation of success that the combination proffered would result in the claimed invention. The Examiner also must show that the cited references disclose each and every element of the claimed invention. (MPEP §2143.) *citing In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991)). A patent composed of several elements is not proved obvious merely by demonstrating that each of its elements was independently known in the prior art. *KSR Int'l C. v. Teleflex, Inc.*, No 04-1350 (U.S. Apr. 30, 2007). It can be important to identify a reason that would have prompted a person of ordinary skill in the relevant field to combine the prior art elements in the manner claimed.

Richard III appears to be directed to a survey of service discovery technologies such as Bluetooth, Jini, Salutation, and Universal Plug and Play (UPnP). Applicants respectfully submit, however, that embodiments of the present invention depart from *Richard III*. For example, embodiments of the present invention depart from the standard techniques for controlling devices under UPnP, wherein interactions between devices are defined by generalized UPnP control and eventing protocols. Instead, embodiments of the invention define service-specific protocols to enable interaction between an extended PC and one or more remote devices that host the services used. In general, these services may include any service provided by a remote device, such as

remote display, remote audio, remote input, and remote video; however, embodiments of the invention are particularly advantageous when considering that in a typical implementation the majority of the hardware and software resources are hosted by the extended PC while the resources required for each remote device are typically “lightweight” in comparison. See Applicants’ Specification at page 19, line 11 to page 30, line 25.

To explain further, Applicants respectfully submit that *Richard III* fails to disclose each and every element of the claimed invention. For example, *Richard III* fails to teach “defining a service-specific protocol to facilitate remote control of a service provided by the remote display device, wherein ***the service-specific protocol defines display commands that are used to display content on the display*** device by sending display commands and data pertaining to the display content from the host computer to the remote device over the network communication link” (emphasis added) as recited in claim 1. Nor does the Examiner assert that *Richard III* discloses this element of claim 1.

Applicants respectfully submit that *Richard III* also fails to disclose “launching a host-side software module to run on the host computer to enable interaction with the service via a service protocol that is specific to the service and a client-side component running on the remote audio device, wherein ***the service protocol includes audio commands that are used to playback audio content on the audio device*** by sending audio commands and audio data pertaining to the audio content from the host computer to the audio device over the network communication link” (emphasis added) as recited in claim 6. Nor does the Examiner assert that *Richard III* discloses this element of claim 6.

Applicants respectfully submit that *Richard III* also fails to disclose “sending commands from the host computer to the remote device over the network communication link based on a service protocol that is specific to the service provided by the remote device to cause the remote device to perform service operations specified by the commands that employ the data sent to the remote device, wherein ***the service protocol includes input primitives to enable input data to be sent from the remote device to be interpreted by the host-side software module running on the***

host computer” (emphasis added) as recited in claim 31. Nor does the Examiner assert that *Richard III* discloses this element of claim 31.

Finally, Applicants respectfully submit that *Richard III* fails to disclose “sending commands from the host computer to the remote device over the network communication link based on a service protocol that is specific to the service provided by the remote device to cause the remote device to perform service operations specified by the commands that employ the data sent to the remote device, wherein *the service protocol includes input primitives to enable input data to be sent from the remote device to be interpreted by the host-side software module running on the host computer*” (emphasis added) as recited in claim 36. Nor does the Examiner assert that *Richard III* discloses this element of claim 36.

Applicants respectfully submit that because *Richard III* fails to disclose each and every element of claims 1, 6, 31, and 36 *Richard III* fails to render claims 1, 6, 31, and 36 obvious. Accordingly, Applicants respectfully submit that claims 1, 6, 31, and 36 are patentable over *Richard III*.

Claims 4, 7-9, 13, 16-30, 33-35 have been canceled rendering the rejection of them moot. Claims 2-3 and 5 properly depend from claim 1. Accordingly, Applicant respectfully submits that claims 2-3 and 5 are patentable for at least the same reasons that claim 1 is patentable. Claims 10-12 and 14-15 properly depend from claim 6. Accordingly, Applicant respectfully submits that claims 10-12 and 14-15 are patentable for at least the same reasons that claim 6 is patentable. Claims 32 and 36-40 properly depend from claim 31. Accordingly, Applicant respectfully submits that claims 32 and 36-40 are patentable for at least the same reasons that claim 31 is patentable. (MPEP §2143.03 (citing *In re Fine*, 837 F.2d 1071, 5 USPQ2d 1596 (Fed. Cir. 1988))). Accordingly, Applicant respectfully requests that the Examiner reconsider and remove the rejection to claims 1-15 and 31-40.

CONCLUSION

Applicant submits that all grounds for rejection have been properly traversed, accommodated, or rendered moot, and that the application is now in condition for allowance. The Examiner is invited to telephone the undersigned representative if the Examiner believes that an interview might be useful for any reason.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN


Date: June 20, 2007 /Jan Little-Washington, Reg. No. 41,181/
Jan Little-Washington
Reg. No. 41,181
(206) 292-8600

FIRST CLASS CERTIFICATE OF MAILING

I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail with sufficient postage in an envelope addressed to Mail Stop Amendment, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450

on June 20, 2007
Date of Deposit

Harleen Bains
Name of Person Mailing Correspondence

 June 20, 2007
Signature Date